

LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number 9683
711 S. 9th Street
Las Vegas, Nevada 89101
T: (702) 435-2121
F: (702) 431-3807
E: lcslawllc@yahoo.com
Attorney for Sonia Feldman

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SONIA FELDMAN,

Plaintiff,

vs.

MARK ANTHONY SAWYER,
JENNIFER ANN SAWYER, NEVADA
MJS TRUST, THE PROPERTY
LOCATED AT 6940 N. JENSEN
STREET, LAS VEGAS, NV 89149-
1365, THE PROPERTY LOCATED AT
508 SETTING MOON STREET,
NORTH LAS VEGAS, NV 89084-1258;
THE VACANT LAND LOCATED AT
APN# 125-19-203-002; ATD
COMMERCE, LLC; ACM NORTH,
LLC; MAS HOLDINGS GROUP, LLC.,
AND SAWYER HOLDINGS, LLC.,

CASE NO.: 2:24-cv-00526-JCM-MDC

**MOTION TO WITHDRAW
AS COUNSEL FOR PLAINTIFF**

COMES NOW, Louis C. Schneider, Esq. of the Law Offices of Louis C.
Schneider, and pursuant to F.R.C.P. Rule 7 (b) and Local Rule IA-6(b), filed this
MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF. This motion is made

1 and based upon the following memorandum of points and authorities, the papers and
2 pleadings on file herein, the Declaration of Louis C. Schneider, Esq. attached hereto,
3
4 together with any oral argument at the time of the hearing, if any.

5 DATED this 30th day of May, 2025.

6
7 /s/ Louis C. Schneider, Esq.
8 LOUIS C. SCHNEIDER, ESQ.
9 Nevada Bar Number 9683
10 711 S. 9th Street
11 Las Vegas, NV 89101
12 (702) 435-2121
13 lcsllawllc@yahoo.com

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. LAW**

16 **A. F.R.C.P. RULE 7(b)(1)(2) MOTIONS AND OTHER PAPERS**
17 states:

18 (1) In General. A request for a court order must be made by motion. The
19 motion must: (A) be in writing unless made during a hearing or trial; (B)
20 state with particularity the grounds for seeking the order; and (C) state
the relief sought.

21 (2) Form. The rules governing captions and other matters of form in
22 pleadings apply to motions and other papers.

23 **B. F.R.C.P. LOCAL RULE IA-6 APPEARANCES,**

24 **SUBSTITUTIONS, AND WITHDRAWALS** states in relevant part:

25
26 (b) If an attorney seeks to withdraw after appearing in a case, the
27 attorney must file a motion or stipulation and serve it on the affected
28 client and opposing counsel. The affected client may, but is not required

1 to, file a response to the attorney's motion within 14 days of the filing of
2 the motion, unless the court orders otherwise.

3 ...

4 (e) Except for good cause shown, no withdrawal or substitution will
5 be approved if it will result in delay of discovery, the trial, or any
6 hearing in the case. Where delay would result, the papers seeking
7 leave of the court for the withdrawal or substitution must request
8 specific relief from the scheduled discovery, trial, or hearing. If a
9 trial setting has been made, an additional copy of the moving papers
10 must be provided to the clerk for immediate delivery to the
11 assigned district judge, bankruptcy judge, or magistrate judge.

12 **II. ARGUMENT**

13 In the instant case, the undersigned counsel respectfully requests this
14 Honorable Court grant the law offices of Louis C. Schneider, Esq. leave to
15 withdraw as attorney of record Plaintiff because of Plaintiffs' failure to
16 communicate to this counsel and for Plaintiff's failure to adequately retain this
17 counsel for this case.

18 Plaintiff has been served a copy of this Motion by placing the Motion in
19 sealed envelopes, postage prepaid and mailed via USPS mail and emailed to
20 Plaintiffs' last known address which is listed below.

21
22 Sonia Feldman
23 8264 Fountain Avenue
24 West Hollywood, California 90046

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2 **III. CONCLUSION**

3 That based upon the foregoing, this Counsel respectfully requests leave
4
5 to withdraw as counsel of record for Plaintiff.

6 */s/Louis C. Schneider*
7 LOUIS C. SCHNEIDER, ESQ.
8 Nevada Bar Number 9683
9 711 S. 9th St.
10 Las Vegas, NV 89101
11 T: (702) 435-2121
12 E: lcsllawllc@yahoo.com
13 *Attorney for Plaintiff Sonia Feldman*
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DECLARATION OF LOUIS C. SCHNEIDER, ESQ.

I, LOUIS C. SCHNEIDER ESQ., do hereby declare, under penalty of perjury under the laws of the State of Nevada, the following statements are true and correct:

1. That Declarant is over the age of eighteen (18), is an attorney duly licensed practice law in the State of Nevada and maintains office at 711 S. 9th Street, Las Vegas, Nevada 89101, is the attorney of record for Plaintiff in this action, and has personal knowledge as to the facts contained herein and will testify as to these facts if called upon to do so;
2. That this motion is brought due to Plaintiff Sonia Feldman's failure to communicate to this Counsel and her failure to adequately retain this Counsel;
3. That I have read the motion and am in full agreement with it;
4. That I declare these things to be true as I have personal knowledge of them, and as to those matters stated upon information and belief, I believe them to be true;

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1 5. Plaintiff has been served a copy of this Motion by placing the Motion in
2 sealed envelopes, postage prepaid and mailed via USPS mail and emailed to
3
4 Plaintiffs' last known address which is listed below.

5 Sonia Feldman
6 8264 Fountain Avenue
7 West Hollywood, California 90046
8

9 6 . Further, Declarant saith naught.

10 /s/ Louis C. Schneider
11 LOUIS C. SCHNEIDER, ESQ.
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Louis C. Schneider, Esq. and that on the 30th day of May, 2025, I served a true and correct copy of the above and forgoing **MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF** was electronically filed and served via the Court's CM/ECF system on all parties currently on the electronic service list.

SONIA FELDMAN
8264 Fountain Avenue
West Hollywood, California 90046
Plaintiff
Sent via USPS mail

MARK ANTHONY SAWYER
6940 N. Jensen Street
Las Vegas, Nevada 89149
Email: msawyer2729@yahoo.com
Defendant
Sent via USPS mail

G. MARK ALBRIGHT, ESQ. (1394)
DANIEL R. ORMSBY, ESQ. (14595)
KYLE W. FENTON, ESQ. (16235)
ALBRIGHT STODDARD WARNICK & ALBRIGHT
801 South Rancho Drive, Ste D-4
Las Vegas, Nevada 89106
T: (702) 384-7111
gma@albrightstoddard.com
dormsby@albrightstoddard.com
kfenton@albrightstoddard.com

1 MICHAEL MACHAT, ESQ.
2 MACHAT & ASSOCIATES, PC
3 *Appearing pro hac vice*
4 California State Bar Number 109475
5 8730 W. Sunset Blvd., Suite 250
6 W. Hollywood, CA 90069
7 T: (310) 860-1833
8 michael@machatlaw.com
9 *Attorneys for Plaintiff, Sonia Feldman*

10 JENNIFER SAWYER
11 6940 N. Jensen Street
12 Las Vegas, Nevada 89149-1365
13 Jen61002@hotmail.com
14 *sent via USPS mail*

15 MJS NEVADA TRUST
16 6940 N. Jenson Street
17 Las Vegas, Nevada 89149
18 *Defendant*
19 *sent via USPS mail*

20 THE PROPERTY LOCATED AT
21 6508 Setting Moon Street
22 North Las Vegas, Nevada 89084-1258
23 *Defendant*
24 *sent via USPS mail*

25 ATD COMMERCE, LLC.
26 C/O US Corporate Solutions, LLC.
27 2685 S. Rainbow Blvd. Ste. 213
28 Las Vegas, Nevada 89146
Defendant
Sent via USPS mail

1 ACM NORTH, LLC
2 C/O US Corporate Solutions LLC
3 2685 S. Rainbow Blvd., Ste. 213
4 Las Vegas, NV 89146
5 *Defendant*
6 *Sent via USPS mail*

7 MAS HOLDINGS GROUP, LLC
8 C/O US Corporate Solutions LLC
9 2685 S. Rainbow Blvd., Ste. 213
10 Las Vegas, NV 89146
11 *Defendant*
12 *Sent via USPS mail*

13 SAWYER HOLDINGS LLC
14 C/O Jeffrey Burr, LTD
15 2600 Paseo Verde Pkwy., Suite 200
16 Henderson, Nevada 89074
17 *Defendant*
18 *Sent via USPS mail*

19 */s/ Stacie De Falco*
20 *An employee of Louis C. Schneider*
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